

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE AS TO
	:	<u>SPECIFIC PROPERTY</u>
DEDE LLESHI,	:	
	:	23 Cr. 248 (JPO)
Defendant.	:	
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WHEREAS, on or about May 16, 2023, DEDE LLESHI (the “Defendant”), was charged in a five-count Indictment, 23 Cr. 248 (JPO) (the “Indictment”), with unlawful procurement of naturalization, in violation of Title 18, United States Code, Sections 1425(a) and 2 (Count One); false statements relating to naturalization, in violation of Title 18, United States Code, Sections 1015(a) and 2 (Counts Two and Three); fraud and misuse of visas, permits, and other documents, in violation of Title 18, United States Code, Sections 1546(a) and 2 (Count Four); and aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2 (Count Five);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Four of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(6), of all conveyances, including any vessel, vehicle, or aircraft, used in the commission of the offenses charged in Counts One and Four of the Indictment; all property, real and personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses charged in Counts One and Four of the Indictment; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of the offenses charged in Counts One and Four of the Indictment, including but

not limited to a sum of money in United States currency representing the amount of proceeds traceable to commission of the offenses charged in Counts One and Four of the Indictment;

WHEREAS, on or about _____, the Defendant pled guilty to Counts One through Four of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Counts One and Four of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6) all right, title, and interest of the Defendant in the following specific property:

- a. One Social Security card issued on or about December 2, 2010 to “Gjelosh Lleshi” with a Social Security Number ending in 2924;
- b. One Permanent Resident card in the name of “Gjelosh Lleshi,” with a USCIS Number ending in 521 and an expiration date on or about February 12, 2023; and
- c. One New Jersey driver’s license issued on or about November 10, 2022 to “Gjelosh Lleshi” with a license number ending in 01842;

(a. through c. collectively, the “Specific Property”);

WHEREAS, the Defendant consents to the forfeiture of all his right, title and interest in the Specific Property, which constitutes property used to facilitate, or intended to be used to facilitate the offenses charged in Count One and Four of the Indictment; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(g), and Rules 32.2(b)(3), and 32.2(b)(6) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Property to its possession and to notify any and all persons who reasonably appear to be a potential claimant of their interest herein;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Jerry J. Fang, of counsel, and the Defendant and his counsel, Marne Lenox, Esq., that:

1. As a result of the offenses charged in Counts One and Four of the Indictment, to which the Defendant pled guilty, all of the Defendant's right, title and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture as to Specific Property is final as to the Defendant DEDE LLESHI, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, the United States Customs and Border Protection, or its designee, the Office of Fines, Penalties and Forfeitures, is hereby authorized to take possession of the Specific Property and to hold such property in its secure custody and control.

4. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the Defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice

on this official government internet web site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

5. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, (ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and extent of the petitioner's right, title or interest in the Specific Property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Property, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

6. Pursuant to 32.2 (b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

7. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Section 853(n), in which all interests will be addressed.

8. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.


9. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture as to Specific Property, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

10. The signature page of this Consent Preliminary Order of Forfeiture as to Specific Property may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:


JERRY J. FANG *Vorun A. Gumbaste*
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2584

12/7/23
DATE

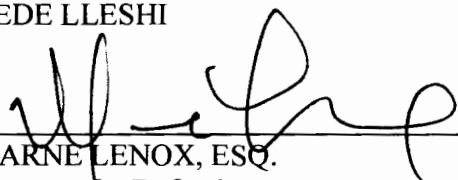
DEDE LLESHI

By:

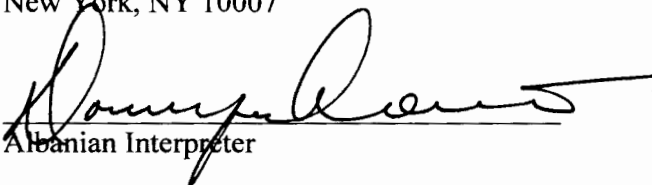

DEDE LLESHI

12/7/23
DATE

By:


MARNE LENOX, ESQ.
Attorney for Defendant
52 Duane Street, 10th Floor
New York, NY 10007

12/7/23
DATE


Albanian Interpreter

SO ORDERED:


HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

12/7/23
DATE